

PROT. 18 1207

Policy of the CURIA GENERALIZIA of the Missionaries of Africa in matters of protection and safeguard of personal data

The CURIA GENERALIZIA of the Missionaries of Africa (CURIA GENERALIZIA) is committed to ensure and to protect the rights of all the members of the Society of the Missionaries of Africa (M.Afr.) to a good reputation and to confidentiality (CDC 220). To that effect CURIA GENERALIZIA has defined its policy of confidentiality and of archiving (*Vademecum of Government for the Provinces*, Files 7 A and 7 B, Edition 2015), which is applied at CURIA GENERALIZIA.

Moreover, for this policy to conform with *il Decreto Generale* of the Italian Episcopal Conference, entitled “*Disposizioni per la tutela del diritto alla buona fama e alla riservatezza*” and which integrates the *General Data Protection Regulation of the European Union* (GDPR) (EU 2016/679), the CURIA GENERALIZIA states the following:

1. The Personal Data (PD) which the CURIA GENERALIZIA keeps is used only for the purpose for which it has been collected. That is to say for: the organization and the administration of the CURIA GENERALIZIA including the Archives of the Society of the Missionaries of Africa; the mission entrusted to the Society of the Missionaries of Africa; the Apostolate of its members; in conformity with the Constitutions and Laws of the said Society, Edition 2016.
2. Any person has the right to access their data that is held by the CURIA GENERALIZIA. They have the right to rectify, delete, transfer, restrict its use and to object to decision making including profiling. Any questions and any appeal to these rights are addressed to the Secretary General, Data Privacy Coordinator (DPC), who refers to the General Council, the data controller.
3. Great care is taken in the care and protection of PD against loss, damage or illicit processing. To that effect, they are kept in metal filing cabinets equipped with locking drawers, and on computers secured by a password which is changed at regular intervals and linked to the system of file storage and backup of the CURIA GENERALIZIA. Moreover, CURIA GENERALIZIA ensures that in any choice of technical or organisational measures minimization of risk and processing will have priority.
4. Only persons appointed by the General Council will have access to the PD, and that only for specific tasks. They will fulfill them under the supervision of the DPC. Any person thus appointed is bound to professional secrecy. That person has the duty to report any violation of the present policy to the DPC, who will take the necessary steps and will inform the General Council.
5. Twice a year the DPC will meet with the contact persons to review the measures taken to put the present policy into effect, the processing which has taken place and any other item concerning the protection and the safeguard of the PD.
6. The PD of persons having a link with the CURIA GENERALIZIA will be only kept for the time necessary to finalize the purpose for which they have been requested.

7. Any member of the Society of the Missionaries of Africa will give his consent in full knowledge of the fact and in writing for the processing of his PD by CURIA GENERALIZIA for the purpose specified above in number one.

The present Policy will be published in the legal notices of the official website of the Missionaries of Africa.

Internal regulations

The General Council, data controller, endorses the measures and the current practice, as they are stated in the VDM Provinces, File 7 A and 7 B, 2016 Edition, and shares the following decisions, being understood that these measures, practices and decisions constitute the internal regulations of the CURIA GENERALIZIA in matters of protection and safeguard of PD.

1. Each contact person at the service of the CURIA GENERALIZIA is responsible for the processing of the PD which concern his department. These contact persons are: The General Secretary, the Administrative Secretary, the Secretary of Initial Formation, the person in charge of publications, the Webmaster, the coordinator for Integrity in Ministry, the Local Superior, the General Treasurer, the Local Treasurer, and the Archivist. Each contact person is to notify any violation of the PD. Every six months, the DPC will meet with the contact persons to evaluate the policy of protection and safeguard and its implementation. The question of risk of violation will be the object of particular attention, if need be with the help of computer technicians. The minutes of these meetings will be kept in a special register and on the computer of the Secretary General. They will be available for consultation.
2. The PD of the members of the Society are registered by the Administrative Secretary. This data is kept in a metal filing cabinet with locked drawers and in the computer of the Administrative Secretary, secured by a password, which is changed every six months. These filing cabinets are accessible to the following persons: The Superior General, his four Assistants, the Secretary General. The computer is accessible to the Administrative Secretary and to the Superior General. The PD is not shared with a third party, unless under legal obligation. If a confrere asks to withdraw some PD, his PD will always be withdrawn from both the digital and material files. They will be archived. The other recipients of these PD will be informed.
3. The PD of the employees will be registered and processed by the Treasurer General, the local bursar and the “commercialista”. All the PD of all the employees are kept in a metal filing cabinet, with locked drawers in the office of the Local Treasurer, and in his computer with a password, which is changed after six months. These PD cannot be shared with a third party, except in a case where an obligation exists. All requests to erase are executed. Other recipients of the PD in question are informed.

4. The employees will receive a letter explaining how their PD are processed and maintained; who is the contact person for all that concerns their PD; how they are being requested to handle any violation of the PD; and any request from a third party. They will give their consent in writing and sign the document to that effect. New employees will receive the same information in an annex to their employment contract.
5. The PD of a person applying for a job and who has not been employed will be eliminated four weeks after the application period has come to an end, except when the person concerned has given his approval. After one year all the PD is erased.
6. For the publications of the CURIA GENERALIZIA, a list of addresses is stored in the Database Microsoft Program, which is managed by the Administrative Secretary. The contact person for publications and the Administrative Secretary are allowed to have access to the list.
All the persons who have their PD on the above-mentioned list are contacted and have the possibility to withdraw their PD from the list. Newcomers must present their request in writing, either by letter or by email, to subscribe or to receive the publication, providing the address where the publication is to be sent.
7. A processing contract is to be made with the following suppliers:
 - a. The Commercialista
 - b. The Website consultant, the computer technicians
 - c. Internet
 - d. Financial, legal, Insurance Counsellors
 - e. Printers
 - f. Plumbers and electricians.
8. The PD of persons applying for help to the Solidarity Fund of the Society of the Missionaries of Africa and who receive a negative response will be withdrawn four weeks after the decision of the General Council concerning their demand. The PD of the persons receiving financial help from the Solidarity Fund will be deleted one year after receiving the final report upon completion of the project.
9. The present regulations will be published in the legal notices of the official site of the Society of the Missionaries of Africa. The local superior will send an email copy of the Policy and of the internal Regulations of the CURIA GENERALIZIA to all members of the community.

Directives

These directives are addressed to the confreres and to the employees processing PD. They are communicated to them by means of a letter of appointment they sign. The directives lay down the methods and the security measures to be observed when processing data.

1. When processing the PD within the frame of their work, they observe the internal regulations of the CURIA GENERALIZIA as well as the instructions of the DPC.
2. They treat them only for the purpose for which these PD have been gathered and safeguarded.
3. They ensure that the most efficient technical and organizational measures are in place to protect and to safeguard all the PD against loss, degradation and illicit processing. These measures must guaranty an appropriate level of security considering the risk involved in the processing and the type of data to protect.
4. They are held to professional secrecy for all the PD. They cannot deviate from it unless the law obliges them to, or when it is required for a task to be done.
5. They must immediately inform the DPC of all requests for any disclosure or of any leak of PD that contravene professional secrecy.
6. They are held responsible for any prejudice and damage as a consequence of their negligence in following the internal regulations.
7. They are to inform the DPC of any violation of PD either accidental or illegal that leads to a loss, modification, or non-authorized disclosure. They will take all the necessary measures to limit consequences and prevent other violations. They will give all the information that will allow the DPC to inform the General Council, who will decide as to inform the person directly concerned and the independent supervisory authority (GDPR, article 91,2).
8. It is understood that the DPC has the right to authorize an audit in order to verify that these directives are effectively followed.
9. All the physical documents being put at the disposal of the confreres/employees concerned by the processing of the PD have to be kept in a metal filing cabinet with locking drawers. The digital files will be kept in a computer secured by a password and safeguarded in a system of file storage and backup of the CURIA GENERALIZIA.
10. Documents are put at their disposal for the time necessary to perform their task as required. After completion of the task, they are given back to the contact person of the department.